

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JAMES GHAI SAR, et al.

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Civil Action No. 1:19-cv-01224

PLAINTIFFS' OBJECTIONS TO DEFENDANTS' EXHIBIT LIST

Plaintiffs, by counsel, pursuant to this Court's scheduling order and the Local Rules of the United States District Court for the Eastern District of Virginia, submit the following objections to Defendant's Exhibit List. Plaintiffs reserve the right to amend or modify any of the objections set forth on the basis of any stipulation entered into by the parties; corrections, revisions or other modifications to the underlying exhibits; any order from the Court on outstanding motions; and any ruling from the Court impacting admissibility.

Plaintiffs object to the introduction of exhibits that are not properly authenticated, but are willing to confer with Defendant regarding means to resolve authenticity objections in advance of trial. However, even in instances where a stipulation as to authenticity may be reached, and unless otherwise noted, Plaintiffs reserve all other objections to admissibility including, but not limited to, objections based on lack of foundation, hearsay and relevance.

No.	Document Description	BEGBATES	ENDBATES	Plaintiffs' Objection(s)
1	Certificate of Death	Ghaisar_US_000898	Ghaisar_US_000898	Conditional objection ¹

¹ Where Plaintiffs enter a conditional objection to one or more entries on Defendant's exhibit list,

2	Fairfax County Dispatch Recording	Ghaisar_US_001116	Ghaisar_US_001116	Conditional objection
3	Tax Records of Bijan Ghaisar	Ghaisar_US_002131	Ghaisar_US_002142	Conditional objection
4	Photograph of Diploma of Bijan Ghaisar	Ghaisar_US_002144	Ghaisar_US_002144	Conditional objection
5	Tax Records of James Ghaisar	Ghaisar_US_002147	Ghaisar_US_002178	Conditional objection
6	Medical records from Dr. Evan Jacobson	Ghaisar_US_002325	Ghaisar_US_002546	Relevance (Fed. R. Evid. 402); Prejudicial and confuses the issues (Fed. R. Evid. 403)
7	Medical Records from Virginia Commonwealth University	Ghaisar_US_002576	Ghaisar_US_002625	Relevance (Fed. R. Evid. 402); Prejudicial and confuses the issues (Fed. R. Evid. 403)
8	SCFP Autopsy Report	Ghaisar_US_002628	Ghaisar_US_002640	Conditional objection
9	Park Police Use of Force Policy	US-00000030	US-00000033	Conditional objection
10	Park Police Vehicular Pursuit Policy	US-00000058	US-00000066	Conditional objection
11	Park Police Dispatch Recording	US-00000752	US-00000752	Conditional objection
12	Commendations of Officer Amaya	US-00000845	US-00000873	Relevance (Fed. R. Evid. 402)
13	Commendations of Officer Vinyard	US-00001014	US-00001027	Relevance (Fed. R. Evid. 402)
14	Recording of Speed Limits Along Route	US-00002116	US-00002117	Relevance (Fed. R. Evid. 402)
15	Summary of FBI Interview of Daniel Gohn	US-00002343-069	US-00002343-083	Relevance (Fed. R. Evid. 402); Hearsay (Fed. R. Evid. 801 and 802)
16	Summary of FBI Interview of Bryant Hartzell	US-00002343-331	US-00002343-342	Hearsay (Fed. R. Evid. 801 and 802)

Plaintiffs reserve the right to object to that exhibit at trial depending on the purpose for which Defendant seeks to introduce it.

17	Certificate of Analysis of the Commonwealth of Virginia Department of Forensic Science	US-00003009	US-00003010	Relevance (Fed. R. Evid. 402); Prejudicial and confuses the issues (Fed. R. Evid. 403)
18	Summary of FBI Interview of Jacob Sipe	US-00003011	US-00003017	Hearsay (Fed. R. Evid. 801 and 802)
19	DEA Chemical Analysis Report	US-00003553	US-00003554	Relevance (Fed. R. Evid. 402); Prejudicial and confuses the issues (Fed. R. Evid. 403)
20	Summary of FBI Interview of Kyle Groome	US-00003733	US-00003735	Hearsay (Fed. R. Evid. 801 and 802)
21	Summary of FBI Interview of Idean Marvastian	US-00003752	US-00003758	Hearsay (Fed. R. Evid. 801 and 802)
22	Summary of FBI Interview of Sam Yeganah	US-00003938	US-00003940	Hearsay (Fed. R. Evid. 801 and 802)
23	Summary of Attorney Proffer for Lucas Vinyard	US-00005375-122	US-00005375-127	Hearsay (Fed. R. Evid. 801 and 802); Relevance (Fed. R. Evid. 402); Prejudicial and confuses the issues (Fed. R. Evid. 403)
24	Summary of Attorney Proffer for Alejandro Amaya	US-00005375-129	US-00005375-136	Hearsay (Fed. R. Evid. 801 and 802); Relevance (Fed. R. Evid. 402); Prejudicial and confuses the issues (Fed. R. Evid. 403)

25	Summary of FBI Interview of Lucas Vinyard	US-00005375-154	US-00005375-180	Hearsay (Fed. R. Evid. 801 and 802); Relevance (Fed. R. Evid. 402); Prejudicial and confuses the issues (Fed. R. Evid. 403)
26	Report of Autopsy of the Commonwealth of Virginia Office of Chief Medical Examiner	US-00005411	US-00005434	Conditional objection
27	Park Police Dispatch Recording	US-00006797	US-00006797	Conditional objection
28	Medical Records from Inova Fairfax	US-00007109	US-00008557	Conditional objection
29	Video of Incident	US-00009495	US-00009495	Cumulative (Fed. R. Evid. 403)
30	Video of Incident	US-00009496	US-00009496	Cumulative (Fed. R. Evid. 403)
31	Video of Incident	US-00009497	US-00009497	Cumulative (Fed. R. Evid. 403)
32	Video of Incident	US-00009498	US-00009498	Cumulative (Fed. R. Evid. 403)
33	Video of Incident	US-00009499	US-00009499	Cumulative (Fed. R. Evid. 403)
34	Video of Incident	US-00009500	US-00009500	Cumulative (Fed. R. Evid. 403)
35	Video of Incident	US-00009501	US-00009501	Cumulative (Fed. R. Evid. 403)
36	Video of Incident	US-00009502	US-00009502	Cumulative (Fed. R. Evid. 403)
37	Video of Incident	US-00009614	US-00009614	Cumulative (Fed. R. Evid. 403)
38	Video of Incident	US-00009615	US-00009615	Cumulative (Fed. R. Evid. 403)
39	Video of Incident	US-00009616	US-00009616	Cumulative (Fed. R. Evid. 403)
40	Video of Incident	US-00009617	US-00009617	Cumulative (Fed. R. Evid. 403)
41	Video of Incident	US-00009618	US-00009618	Cumulative (Fed. R. Evid. 403)

42	Video of Incident	US-00009619	US-00009619	Cumulative (Fed. R. Evid. 403)
43	Video of Incident	US-00009620	US-00009620	Cumulative (Fed. R. Evid. 403)
44	Video of Incident	US-00009621	US-00009621	Cumulative (Fed. R. Evid. 403)
45	Video of Incident	US-00009622	US-00009622	Cumulative (Fed. R. Evid. 403)
46	Video of Incident	US-00009623	US-00009623	Cumulative (Fed. R. Evid. 403)
47	Video of Incident	US-00009624	US-00009624	Cumulative (Fed. R. Evid. 403)
48	Video of Incident	US-00009625	US-00009625	Cumulative (Fed. R. Evid. 403)
49	Fairfax County Dispatch Recording	US-00010165	US-00010165	Conditional objection
50	Video of Incident	US-00011274	US-00011274	Conditional objection
51	Photograph from scene	US-00013555	US-00013555	Conditional objection
52	Supplemental Criminal Incident Report	US-00013639	US-00013640	Relevance (Fed. R. Evid. 402); Prejudicial and confuses the issues (Fed. R. Evid. 403)
53	TSU Mapping	US-00013641	US-00013645	Conditional objection
54	Photograph from scene	US-00016555	US-00016555	Conditional objection
55	Photograph from scene	US-00016715	US-00016715	Conditional objection
56	Photograph from scene	US-00016722	US-00016722	Conditional objection
57	Photograph from scene	US-00016811	US-00016811	Conditional objection
58	Photograph from scene	US-00016867	US-00016867	Relevance (Fed. R. Evid. 402); Prejudicial and confuses the issues (Fed. R. Evid. 403)

59	Photograph from scene	US-00016870	US-00016870	Relevance (Fed. R. Evid. 402); Prejudicial and confuses the issues (Fed. R. Evid. 403)
60	Photograph from scene	US-00016871	US-00016871	Relevance (Fed. R. Evid. 402); Prejudicial and confuses the issues (Fed. R. Evid. 403)
61	Email Re: Change in Org Chart and Area	US-00018631	US-00018633	Conditional objection
62	FBI Chain of Custody Log	US-00018730	US-00018730	Relevance (Fed. R. Evid. 402); Prejudicial and confuses the issues (Fed. R. Evid. 403)
63	Photograph - King Street and South Washington Streets	US-00018731	US-00018731	Conditional objection
64	Photograph - Southbound South Washington Street at King Street	US-00018732	US-00018732	Conditional objection
65	Photograph - King Street and South Washington Streets	US-00018733	US-00018733	Conditional objection
66	Photograph - South Washington Street (George Washington	US-00018734	US-00018734	Conditional objection
67	Photograph - South Washington Street at Jefferson Street	US-00018735	US-00018735	Conditional objection
68	Photograph - Southbound George Washington Memorial Parkway	US-00018736	US-00018736	Conditional objection
69	Photograph - Mount Vernon Trail Crossing at West Boulevard and	US-00018737	US-00018737	Conditional objection
70	Photograph - West Boulevard and Alexandria Avenue	US-00018738	US-00018738	Conditional objection
71	Photograph - Alexandria Avenue	US-00018739	US-00018739	Conditional objection

72	Photograph - Alexandria Avenue and Fort Hunt Road	US-00018740	US-00018740	Conditional objection
73	Photograph - South Washington Street and Duke Street	US-00018741	US-00018741	Conditional objection
74	Photograph - Southbound George Washington Memorial Parkway at Duke Street	US-00018742	US-00018742	Conditional objection
75	Photograph - Southbound George Washington Memorial Parkway at night	US-00018743	US-00018743	Conditional objection
76	Photograph - Southbound George Washington Memorial Parkway at Duke Street at night	US-00018744	US-00018744	Conditional objection
77	Photograph - South Washington Street at Jefferson Street at night	US-00018745	US-00018745	Conditional objection

Dated: August 31, 2020

Respectfully submitted,

/s/ Thomas G. Connolly
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CERTIFICATE OF SERVICE

I hereby certify that on this date, I filed the foregoing via the CM/ECF system, which will send a Notification of Electronic Filing to the following:

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